

From: [Wright, Jeff](#)
To: [Gary Moore/R6/USEPA/US@EPA](#)
Cc: [Bordelon, David](#)
Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions
Date: 01/17/2013 12:39 PM

I've looked over that report and noted the following observations:

- 1) The two primary objectives were for the treated material to meet requirements for either RCRA Subtitle C- or RCRA Subtitle D-equivalent on-site disposal cell
Subtitle C requirements - UCS greater than 25 psi with no free liquids
Subtitle D requirements - UCS greater than 50 psi with no free liquids, permeability less than 1×10^{-6} cm/sec and SPLP contaminant concentrations less than Texas Class 3 groundwater standards
- 2) They were able to meet the Subtitle C requirements but none of their formulations met the Subtitle D requirements.
It is stated that hazardous contaminants are present in the samples (i.e. benzene, methylene chloride); however they still provide recommended formulations to meet Subtitle C requirements. Would be interested to see if they went with the Subtitle C requirements.
- 3) Using cement, quicklime and fly ash, the average volume increase was around 14%

I also spoke with John Halk again today. He reconfirmed that at the Bayou Trepagnier site their solidification/stabilization criteria was 8 psi UCS. No SPLP analyses were conducted. He does not seem too concerned about SPLP, but it would probably be a good idea to have that data. May be we should set our UCS criteria at 10, 25 and 50, which would correspond to the Subtitle C and D requirements.

I would like to go ahead and request a Treatability proposal from the lab (which we will need for any future work plan). Again the only information they need is the number of reagents we would like to use; the COC concentration reduction goals, along with the UCS and permeability criteria. This would provide a good cost quote.



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From: Moore.Gary@epamail.epa.gov [mailto:Moore.Gary@epamail.epa.gov]

Sent: Wednesday, January 16, 2013 3:26 PM

To: Wright, Jeff

Subject: RE: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

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